

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LYDIA GARCIA, Individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN,
STEPHEN BERMAN, and JOEL BENNETT,

Defendants.

Case No. 04-cv-08807 (KMK)

CLASS ACTION

QUANTUM EQUITIES, L.L.C., Individually and
on behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN,
STEPHEN BERMAN, and JOEL BENNETT,

Defendants.

Case No. 04-cv-08877 (KMK)

CLASS ACTION

(Additional Captions Set Forth Below)

**NOTICE OF MOTION OF THE TUCKER GROUP FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF LEAD
COUNSEL**

JAMES T. KAHN, On behalf of himself and all
others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN,
STEPHEN BERMAN, and JOEL BENNETT,

Defendants.

Case No. 04-cv-08910 (KMK)

CLASS ACTION

JONCO INVESTORS, LLC, Individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN,
STEPHEN BERMAN, and JOEL BENNETT,

Defendants.

Case No. 04-cv-09021 (KMK)

CLASS ACTION

JAMES IRVINE, Individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN,
STEPHEN BERMAN, and JOEL BENNETT,

Defendants.

Case No. 04-cv-09078 (KMK)

CLASS ACTION

PLEASE TAKE NOTICE that class members Kenneth J. Tucker, Scott L. Pearlstone, Trudy Fanning, Tonia R. Tucker-Kraus and Michael Kraus (the “Tucker Group”) by their counsel, will hereby move this Court on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, NY, for an Order: (i) consolidating the above-captioned actions pursuant to Fed. R. Civ. P. 42(a); (ii) appointing the Tucker Group as Lead Plaintiff pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(iii); (iii) approving the Tucker Group’s selection of the law firm of Milberg Weiss Bershad & Schulman LLP to serve as Lead Counsel pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v); and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, the Tucker Group submits herewith a Memorandum of Law, [Proposed] Order and the Declaration of Andrei V. Rado dated January 4, 2005.

DATED: January 4, 2005

Respectfully submitted,
**MILBERG WEISS BERSHAD &
SCHULMAN LLP**

By: _____/s/_____
Steven G. Schulman (SS-2561)
Peter E. Seidman (PS-8769)
Andrei V. Rado (AR-3724)
One Pennsylvania Plaza - 49th Floor
New York, NY 10119
(212) 594-5300

Proposed Lead Counsel

THE BRUALDI LAW FIRM
Richard B. Brualdi
29 Broadway, Suite 2400
New York, NY 10006
Tel: (212) 952-0602
Fax: (212) 952-0608

Plaintiff’s Counsel

CERTIFICATE OF SERVICE BY ATTORNEY

I, Andrei V. Rado, an associate with the law firm Milberg Weiss Bershad & Schulman LLP, hereby certify that I caused a true and correct copy of the following to be served by regular U.S. Mail to all parties listed on the attached service list on this 4th day of January 2005.

1. MEMORANDUM OF LAW IN SUPPORT OF THE MOTION OF THE TUCKER GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL;
2. [PROPOSED] ORDER CONSOLIDATING ACTIONS AND APPOINTING LEAD PLAINTIFF AND LEAD COUNSEL;
3. NOTICE OF MOTION OF THE TUCKER GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF LEAD COUNSEL; and
4. DECLARATION OF ANDREI V. RADO IN SUPPORT OF THE MOTION OF THE TUCKER GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL.

_____/s/_____
Andrei V. Rado

JAKKS PACIFIC, INC.
04-CV-8807 (S.D.N.Y.)

Service List

<i>Counsel for Plaintiffs</i>	
Samuel H. Rudman David A. Rosenfeld LERACH, COUGHLIN, STOIA, GELLER, RUDMAN & ROBBINS, LLP 200 Broadhollow Road, Ste. 406 Melville, NY 11747 Tel.: (631) 367-7100 Fax: (631) 367-1173	Frederick T. Isquith Christopher S. Hinton WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP 270 Madison Avenue New York, NY 10016 Tel.: (212) 545-4600 Fax: (212) 545-4653
Louis F. Burke LOUIS F. BURKE P.C. 460 Park Avenue, 21 st Floor New York, NY 10022 Tel.: (212) 682-7200 Fax: (212) 808-4280	Ken H. Chang Marian P. Rosner Michael Adam Schwartz WOLF POPPER LLP 845 Third Avenue New York, NY 10022 Tel.: (212) 451-9667 Fax: (212) 486-2093
Marc A. Topaz Richard A. Maniskas SCHIFFRIN & BARROWAY Three Bala Plaza East Suite 400 Bala Cynwyd, PA 19004 Tel.: (610) 667-7706 Fax: (610) 667-7056	Eric James Belfi MURRAY, FRANK & SAILER, LLP 275 Madison Avenue, Ste. 801 New York, NY 10016 Tel.: (212) 682-1818 Fax: (212) 682-1892
Alfred G. Yates, Jr. Gerald L. Rutledge LAW OFFICE OF ALFRED G. YATES JR. 519 Allegheny Building 429 Forbes Avenue Pittsburgh, PA 15219 Tel.: (412) 391-5164	Richard B. Brualdi The Brualdi Law Firm 29 Broadway, Suite 2400 New York, NY 10006 Tel.: (212) 952-0602 Fax: (212) 952-0608

<i>Counsel for Defendants</i>	
John R. Williams SCHWEITZER COMMAN GROSS & BONDELL LLP 292 Madison Avenue New York, NY 10017 Tel: (646) 424-0770	Isaac S. Greaney SIDLEY AUSTIN BROWN & WOOD 787 7th Avenue, 22nd Floor New York, NY 10019 Tel.: (212) 906-2000

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LYDIA GARCIA, Individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN,
STEPHEN BERMAN, and JOEL BENNETT,

Defendants.

Case No. 04-cv-08807 (KMK)

CLASS ACTION

QUANTUM EQUITIES, L.L.C., Individually and
on behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN,
STEPHEN BERMAN, and JOEL BENNETT,

Defendants.

Case No. 04-cv-08877 (KMK)

CLASS ACTION

(Additional Captions Set Forth Below)

**[PROPOSED] ORDER CONSOLIDATING ACTIONS AND APPOINTING LEAD
PLAINTIFF AND LEAD COUNSEL**

<p>JAMES T. KAHN, On behalf of himself and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN, and JOEL BENNETT,</p> <p style="text-align: center;">Defendants.</p>	<p>:</p> <p>:</p> <p>:</p> <p>Case No. 04-cv-08910 (KMK)</p> <p>:</p> <p>:</p> <p><u>CLASS ACTION</u></p> <p>:</p> <p>:</p> <p>:</p>
<p>JONCO INVESTORS, LLC, Individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN, and JOEL BENNETT,</p> <p style="text-align: center;">Defendants.</p>	<p>:</p> <p>:</p> <p>:</p> <p>Case No. 04-cv-09021 (KMK)</p> <p>:</p> <p>:</p> <p>CLASS ACTION</p> <p>:</p> <p>:</p> <p>:</p>
<p>JAMES IRVINE, Individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN, and JOEL BENNETT,</p> <p style="text-align: center;">Defendants.</p>	<p>:</p> <p>:</p> <p>:</p> <p>Case No. 04-cv-09078 (KMK)</p> <p>:</p> <p>:</p> <p>CLASS ACTION</p> <p>:</p> <p>:</p> <p>:</p>

Upon consideration of the motions and supporting papers filed by Kenneth J. Tucker, Scott L. Pearlstone, Trudy Fanning, Tonia R. Tucker-Kraus and Michael Kraus (the “Tucker Group”) and the other movants for lead plaintiff in the above-captioned action and for good cause shown,

IT IS HEREBY ORDERED THAT:

1. The Motion of the Tucker Group is **GRANTED**;
2. The above-captioned actions are **CONSOLIDATED** pursuant to Fed. R. Civ. P. 42(a);
3. Kenneth J. Tucker, Scott L. Pearlstone, Trudy Fanning, Tonia R. Tucker-Kraus and Michael Kraus are hereby **APPOINTED** to serve as Lead Plaintiff in the consolidated action, pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(iii).
4. The law firm of Milberg Weiss Bershad & Schulman LLP is hereby **APPOINTED** to serve as Lead Counsel for the Class, pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v).

SO ORDERED.

DATED: _____, 2005

UNITED STATES DISTRICT
JUDGE